

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

David P. Donovan,

Plaintiff,

v.

Beth A. Wilkinson,

Defendant.

Civil Action No. 1:20-cv-1344

**MOTION TO FILE DEFENDANT’S OPPOSITION TO THE MOTION FOR
PRELIMINARY INJUNCTION UNDER SEAL**

Pursuant to Local Civil Rule 5(C), Defendant, by undersigned counsel, hereby moves to file her Opposition to the Plaintiff’s Motion for Preliminary Injunction under seal.

Defendant is filing this motion solely out of abundance of caution to comply with Defendant’s obligations under Local Rule 5(C). The parties are presently litigating before Magistrate Judge Davis the extent to which information in the parties’ pleadings will be subject to sealing. Because that issue remained pending at the time of preparation of this filing, we file this document entirely under seal so as not to inadvertently disclose information that Magistrate Davis determines to merit sealing. Defendant’s position, however, remains that all or nearly all of the information in her Opposition should be filed publicly, and plans to refile a public version of this pleading once Magistrate Davis has resolved the relevant sealing issues.

Pursuant to Local Civil Rule 5(C), Defendant provides the following non-confidential description of the material that has been filed under seal: a memorandum of law opposing Plaintiff’s request for preliminary injunctive relief.

Dated: November 20, 2020

Respectfully submitted,

Defendant

By: /s/ Thomas G. Connolly

Thomas G. Connolly (VA Bar No. 29164)

Thomas B. Mason (*pro hac vice forthcoming*)

Jared Paul Marx (VA Bar No. 91213)

HARRIS, WILTSHIRE & GRANNIS, LLP

1919 M Street NW, 8th Floor

Telephone: (202) 730-1300

Fax: (202) 730-1301

tconnolly@hwglaw.com

tmason@hwglaw.com

jmarx@hwglaw.com

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this date, I caused a true copy of the Notice of Filing a Motion to Seal to be served by ECF on the following:

Cathy A. Hinger
Lela M. Ames
WOMBLE BOND DICKINSON LLP
1200 Nineteenth Street, NW, Suite 500
Washington, D.C. 20036

Dated: November 16, 2020

/s/ Thomas G. Connolly
Thomas G. Connolly